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Attorneys for Defendant
UNITED PARCEL SERVICE, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CRAIG OGANS, on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

UNITED PARCEL SERVICE, INC. and
DOES 1 to 100,

Defendants.

Case No. 3:17-cv-02443-MMC

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
DEFENDANT UNITED PARCEL
SERVICE, INC. TO RESPOND TO FIRST
AMENDED COMPLAINT**

Judge: Hon. Maxine M. Chesney
Courtroom: 7

1 By and through their respective attorneys of record, Plaintiff Craig Ogans and Defendant
2 United Parcel Service, Inc. ("UPS") (collectively, the "Parties") stipulate and agree as follows:

3 WHEREAS, Plaintiff filed his initial Complaint in San Francisco Superior Court on
4 March 6, 2017;

5 WHEREAS, UPS removed the action to this Court on April 28, 2017;

6 WHEREAS, UPS moved to dismiss Plaintiff's Complaint for failure to state a claim upon
7 which relief can be granted on May 5, 2017;

8 WHEREAS, Plaintiff filed his First Amended Complaint on May 19, 2017;

9 WHEREAS, the current deadline for UPS's response to Plaintiff's First Amended
10 Complaint is June 2, 2017;

11 WHEREAS, the Parties would like additional time to discuss the allegations contained in
12 Plaintiff's First Amended Complaint to possibly narrow the issues and avoid unnecessary motion
13 practice;

14 THEREFORE, the Parties stipulate and agree to extend the time for UPS to file and serve
15 its response to Plaintiff's First Amended Complaint to June 30, 2017.

16 DATED: June 1, 2017

FRONTIER LAW CENTER

17 BY: /s/ Adam Rose

18 ADAM ROSE

19 Attorneys for Plaintiff
CRAIG OGANS

20 The undersigned attests that the signatory listed above concurs in the content of this
21 document and has authorized its filing.

22 DATED: June 1, 2017

GRUBE BROWN & GEIDT LLP

23 BY: /s/ Elizabeth A. Brown

24 ELIZABETH A. BROWN

25 Attorneys for Defendant
26 UNITED PARCEL SERVICE, INC.

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1. I am an attorney duly licensed to practice before this Court and before all of the Courts of the State of California. I am a Partner at the law firm of Grube Brown & Geidt LLP and counsel of record for Defendant United Parcel Service, Inc. (“UPS”) in this action.

3. Instead of opposing UPS's motion to dismiss, Plaintiff filed his First Amended Complaint on May 19, 2017.

5. Good cause exists to extend the deadline for UPS to file its response to the First Amended Complaint from June 2, 2017 to June 30, 2017. This enlargement of time is needed by the parties to discuss the allegations in the First Amended Complaint and possibly narrow the issues, thereby avoiding unnecessary motion practice.

7. This requested time modification would not alter the schedule for the case.

Executed this 1st day of June, 2017, at Los Angeles, California.

~~ELIZABETH A. BROWN~~

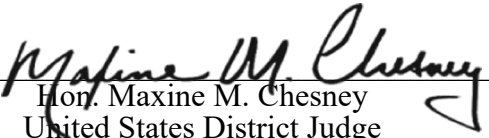
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~~PROPOSED~~ ORDER

This Court, having reviewed the foregoing Stipulation, and good cause appearing therefor, HEREBY ORDERS that the deadline for Defendant United Parcel Service, Inc. to file and serve its response to Plaintiff's First Amended Complaint shall be extended to and ~~including~~ ^{include} June 30, 2017.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 1, 2017



Hon. Maxine M. Chesney
United States District Judge